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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

POLYCOR INC. and ROCK OF AGES CORPORATION, Plaintiffs, v. ANTOLINI LUIGI & C. S.P.A. and ANTOLINI DO BRASIL LTDA., Defendants.	**Civil Action No.** **COMPLAINT**

Plaintiffs Polycor Inc. ("Polycor"), of 70 Rue Saint-Paul, Quebec City, Canada, and Rock of Ages Corporation ("Rock of Ages"), of 560 Graniteville Rd. Graniteville, Vermont, (Polycor and Rock of Ages collectively, the "Plaintiffs"), by and through their undersigned attorneys, as and for their Complaint against defendants Antolini Luigi & C. S.p.A. ("Antolini"), of Via Guglielmo Marconi, 101, Fraz. Sega, 37015 Cavaion, Verona, Italy, and Antolini do Brasil Ltda. ("Antolini Brazil"), of Rod. ES-010, 8605 Ourimar - Serra / ES, Brazil (Antolini and Antolini Brazil collectively, the "Antolini Companies" or "Defendants"), hereby allege as follows:

NATURE OF THE ACTION

1. This action arises out of the Antolini Companies' scheme to unfairly compete in the international market for natural stone products by infringing upon Plaintiffs' trademarks.

2. Although they twice have been placed on detailed written notice that they are infringing upon Plaintiffs' intellectual property rights, the Antolini Companies have disregarded those detailed cease and desist letters and continue to execute on their scheme to improperly benefit from Plaintiffs' long-standing and substantial investment in the development and marketing of Plaintiffs' marks.

3. Polycor and Rock of Ages bring this action to obtain a permanent injunction against the Antolini Companies and to recover for the substantial damages sustained as a direct result of the Defendants' knowing and willful violations of federal and state laws.

THE PARTIES

4. Polycor is a corporation duly organized and existing under the laws of Quebec, Canada. It maintains its principal place of business in Quebec City, Canada.

5. Rock of Ages, a wholly-owned subsidiary of Polycor, is a corporation duly organized and existing under the laws of the State of Vermont. It maintains its principal place of business in Graniteville, Vermont.

6. Polycor and its subsidiaries, including Rock of Ages, are engaged in the business of quarrying and transforming natural stone into products used in commercial and residential construction, landscaping and monuments. They own the trademark rights the Defendants have violated and continue to violate through their knowing and willful misconduct.

7. Antolini is a corporation organized and existing under the laws of Italy. It maintains its principal place of business in Verona, Italy.

8. Antolini Brazil is a corporation organized and existing under the laws of Brazil. It maintains its principal place of business in Serra, Brazil.

9. The Antolini Companies bill themselves as one of the world's largest producers of natural stone slabs. Antolini and its subsidiaries and affiliated entities operate quarries around the world.

JURISDICTION AND VENUE

10. Plaintiffs bring this action under the Lanham Trademark Act, 15 U.S.C. §§ 1051 *et seq.* (the "Lanham Act"), and the laws of the State of New Jersey based on the Antolini Companies' willful trademark infringement, false designation of origin or sponsorship, and unfair competition.

11. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338 because this is an action for trademark infringement under the Lanham Act, 15 U.S.C. § 1121.

12. This Court has jurisdiction over the state law claim asserted herein pursuant to 28 U.S.C. §§ 1338 and 1367.

13. Venue is proper under 28 U.S.C. § 1391(b) (2) and (3)in that a substantial part of the events or omissions giving rise to this action occurred within this District and the Defendants are subject to this Court's personal jurisdiction with respect to this action.

FACTUAL BACKGROUND

Plaintiffs' Business Operations

14. Polycor is the largest fully integrated manufacturer and distributor of natural stone in North America, with thirty quarries, twelve manufacturing plants and more than 800 employees, the majority of whom are employed in the United States.

15. Polycor quarries granite, marble, limestone, soapstone and quartz. It then transforms those blocks of natural stone into slabs, tiles, mosaics and landscaping products.

16. Natural stone products produced by Polycor and its subsidiaries have been used in such iconic sites as the United States Capitol Building, New York Stock Exchange, Jefferson Memorial, Smithsonian Museum of Natural History, St. Patrick's Cathedral, Lincoln Memorial and Arlington National Cemetery.

17. Rock of Ages is engaged in the business of granite quarrying and finishing. It owns quarries in several states as well as Canada. Founded in 1885, today Rock of Ages produces the highest volume of dimensional granite in North America.

The Antolini Companies' Business Operations

18. The Antolini Companies export their products from Italy, Brazil and other countries to various markets throughout the world, including the United States, through a network of distributors, wholesalers and retailers.

19. They promote and sell products to third party retailers across the United States through numerous means, including their website located at www.antolini.com (the "Antolini Website").

20. Antolini's products are available in over thirty showrooms in the United States and Canada, including at least one showroom in Jamesburg, New Jersey.

21. Antolini products are routinely imported into the United States through numerous ports, including Port Newark–Elizabeth Marine Terminal in New Jersey. These products are then distributed to and sold from locations across the country, including at least three authorized distributors located in Monroe, Cedar Grove, and Carlstadt, New Jersey.

Plaintiffs' Trademarks

22. To protect their substantial investment in the development and marketing of their products, Polycor and its subsidiaries have taken all reasonable and necessary steps to register and maintain their intellectual property rights in those products.

23. For example, the AMERICAN BLACK mark has been used for over twenty years in connection with the promotion and sale of one of Polycor's granite products (the "AMERICAN BLACK Mark").

24. Rock of Ages is the sole owner in the United States of the AMERICAN BLACK Mark. It distributes goods in connection with the AMERICAN BLACK Mark throughout the United States.

25. Plaintiffs expend substantial resources to protect and enforce the rights in the AMERICAN BLACK Mark.

26. The AMERICAN BLACK Mark is incontestable pursuant to 15 U.S.C. § 1065.

27. Similarly, the CAMBRIAN BLACK mark has been used for thirty years in connection with the promotion and sale of another of Polycor's granite products (the "CAMBRIAN BLACK Mark").

28. Polycor is the sole owner in the United States of the CAMBRIAN BLACK Mark. It distributes goods in connection with the CAMBRIAN BLACK Mark throughout the United States.

29. Plaintiffs expend substantial resources to protect and enforce the rights in the CAMBRIAN BLACK Mark.

30. The registrations for the AMERICAN BLACK Mark and CAMBRIAN BLACK Mark (together, the "Polycor Marks") are valid and subsisting. Polycor and Rock of Ages use

the Polycor Marks in connection the promotion and sale of their products. True copies of U.S. Trademark Registration certificates for the Polycor Marks are attached hereto as Exhibit A. Images of representative samples of products promoted and sold in connection with the Polycor Marks are attached hereto as Exhibit B (the "Polycor Products").

31. Plaintiffs have dedicated substantial amounts of money and other resources in connection with the promotion of the Polycor Marks. For example, since their first use in the United States, the Polycor Marks and products sold in connection with those marks are and have been the subject of extensive advertising and promotional campaigns through social media, editorials and blogs, product placement campaigns with designers, and home show events.

32. In addition to the marketing and sale of these products to stone slab distributors, products sold in connection with the Polycor Marks are promoted and sold online at Polycor's websites located at polycor.com and shop.polycor.com. They also are promoted through social media, including Facebook, YouTube, Instagram and Twitter.

33. Products using the Polycor Marks also have been promoted and sold through an extensive network of authorized third-party distributors and retailers. Further, Plaintiffs market and promote products in connection with the Polycor Marks through a distribution network in point of sale displays, print advertisements in trade magazines, and at major national and international trade shows.

34. Sales of products using the Polycor Marks have generated between $15 million to $20 million annually since Plaintiffs' first promotion and sale of such products in connection with the Polycor Marks in the United States decades ago.

35. As a result of Plaintiffs' substantially exclusive use of the Polycor Marks in the United States for decades in connection with products of the highest quality, and extensive

promotion and media attention associated with the Polycor Marks and Polycor Products in the United States, the Polycor Marks are associated exclusively with Plaintiffs (or an unidentified single source) by the consuming public. The Polycor Marks are widely recognized by the general consuming public of the United States as a designation indicating the source of goods or services.

36. By virtue of the high-quality nature of their goods and longstanding use, extensive promotion and advertising relating to the Polycor Marks and Plaintiffs' goods and services, Plaintiffs have established a valuable reputation and have achieved significant good will of considerable value to Plaintiffs in the Polycor Marks in the United States.

37. As a result of these efforts, the Polycor Marks are associated exclusively with Plaintiffs and its high-quality goods by the consuming public. The Polycor Marks have acquired secondary meaning as a matter of law.

38. The rights in and to the Polycor Marks have never been licensed to the Antolini Companies. The Antolini Companies are not otherwise authorized to sell products using the Polycor Marks.

The Antolini Companies' Infringing Activities

39. Without Plaintiffs' authorization, the Antolini Companies have promoted and sold granite products using marks that are confusingly identical to the Polycor Marks (collectively, the "Infringing Goods"). The Infringing Goods have been promoted and sold via the Antolini Website and through various third party distributors and retailers, including but not limited to OHM International, located in Monroe, New Jersey. Copies of printouts from Defendants' website depicting examples of Antolini's use of identical marks to the Polycor Marks in connection with the sale of granite are attached hereto as Exhibit C.

40. The Antolini Companies regularly import the Infringing Goods into the United States through numerous ports, including Port Newark-Elizabeth Marine Terminal.

The Antolini Companies' Knowing and Willful Conduct

41. Plaintiffs' U.S. trademark registrations for the Polycor Marks constitute constructive notice of their prior rights in the marks. Rather than expending resources to develop, create and promote their own unique marks, the Antolini Companies are knowingly and wrongfully using Plaintiffs' well-known Polycor Marks to take advantage of the markets and goodwill Plaintiffs have created and maintained at considerable expense.

42. The Antolini Companies are aware of the reputation and strength of the Polycor Marks and the incalculable goodwill symbolized thereby. They were aware of Plaintiffs' rights in the Polycor Marks prior to their manufacture, distribution, promotion and sale of the Infringing Goods.

43. Accordingly, the Antolini Companies' unauthorized manufacture, distribution, promotion and sale of products using marks identical to the Polycor Marks is willful as a matter of law, and designed to trade on and benefit from the goodwill Plaintiffs have established in the Polycor Marks.

44. The Antolini Companies' manufacture, promotion and sale of the Infringing Goods is an attempt to misappropriate the skills, expenditures and labors of Polycor and Rock of Ages, and to profit from the commercial advantage they have established and the recognition they have achieved for the Polycor Marks.

Plaintiffs' Discovery of, and Response to, the Antolini Companies' Infringing Activities

45. Plaintiffs first became aware of the Antolini Companies' sale of the Infringing Goods in early December 2016. At that time, one of their sales representatives discovered in a

California warehouse goods offered for sale by Antolini using marks confusingly identical to the Polycor Marks. Plaintiffs' sales representatives thereafter discovered that the Infringing Goods were being promoted and sold in various other locations throughout the United States.

46. On December 12, 2016, Plaintiffs' in-house counsel wrote to Antolini, demanding that it cease and desist from the manufacture, promotion and sale of the Infringing Goods. This letter provided Defendants with actual notice and full knowledge of Plaintiffs' prior rights and registrations in and to the Polycor Marks.

47. The Antolini Companies ignored Plaintiffs' cease and desist letter and thereafter continued the promotion and sale of the Infringing Goods.

48. On January 27, 2017, Plaintiffs' counsel in Italy forwarded to Antolini a second cease and desist letter, demanding in Italian that Antolini cease and desist from manufacturing, distributing, promoting and selling products that infringed upon the Polycor Marks.

49. Antolini's counsel in Italy acknowledged but rejected this second cease and desist letter. Antolini thereafter continued to manufacture, distribute, promote and sell the Infringing Goods after receiving notice from Plaintiffs that the goods were infringing. Such conduct indicates bad faith on the part of Defendants.

Plaintiffs Have Sustained and Will Continue to Sustain
Substantial Irreparable Harm Due to Antolini's Wrongful Conduct

50. The Antolini Companies' manufacture, distribution, promotion and sale of the Infringing Goods have harmed and will continue to seriously and irreparably harm Plaintiffs and the goodwill it has accumulated over decades at considerable expense.

51. The Antolini Companies' manufacture, distribution, promotion and sale of the Infringing Goods has resulted and is likely to continue to result in confusion and has misled and is likely to continue to mislead the public into falsely believing that Plaintiffs sponsor, approve,

license, or are associated or affiliated with, the Defendants and/or Defendants' Infringing Goods.

52. Consumer confusion is particularly likely given that the Antolini Companies' manufacture, distribute, promote and sell products in the same or similar channels of trade as Plaintiffs. Such conduct clearly is designed to misappropriate Plaintiffs' products which have received uniformly positive recognition among consumers, retailers and wholesalers

53. To protect Plaintiffs' intellectual property rights, a permanent injunction is necessary to prevent the Antolini Companies from any future manufacture, distribution, promotion or sale of the Infringing Goods, or from further misappropriating the trademarks and designations associated with Plaintiffs.

COUNT I

Willful Infringement of Registered Trademark in Violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114

54. Plaintiffs repeat and reallege the allegations contained in paragraphs 1 through 53, as if fully set forth herein.

55. Plaintiffs are the owners of the Polycor Marks registered on the U.S. Principal Register, and which are valid marks entitled to protection.

56. The Antolini Companies have infringed the registered Polycor Marks by the unauthorized use of the Polycor Marks and/or marks that are confusingly similar thereto on and in connection with the manufacture, distribution, promotion and sale of Defendants' products in interstate commerce without Plaintiffs' permission or consent.

57. The Antolini Companies have notice and are well aware of Plaintiffs' Polycor Marks.

58. The Antolini Companies' use of the Polycor Marks and/or marks that are confusingly similar thereto has been and shall be committed with the intent to cause confusion

and deceive the public, take advantage of the good will associated with the Polycor Marks, and/or in willful disregard of Plaintiffs' rights.

59. Defendants' activities are likely to lead to and result in consumer confusion, mistake or deception, and are likely to cause consumers and the public to believe that Plaintiffs have produced, sponsored, authorized, licensed or otherwise approved Defendants' use of the Polycor Marks.

60. Without a permanent injunction, Defendants intend to continue their willful infringement of the Polycor Marks.

61. Plaintiffs have been and will continue to be irreparably harmed unless Defendants are permanently enjoined from its unlawful conduct.

62. Plaintiffs have no adequate remedy at law.

63. In light of the foregoing, Plaintiffs are entitled to an injunction prohibiting Defendants from using the Polycor Marks, and any marks confusingly similar to the Polycor Marks.

COUNT II.

Unfair Competition and False Designation of Origin or Sponsorship Under Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a)

64. Plaintiffs repeat and reallege the allegations contained in paragraphs 1 through 63, as if fully set forth herein.

65. Defendants' promotion, distribution, sale and offering for sale of Infringing Goods using Polycor Marks and/or marks that are confusingly similar thereto is likely to confuse, mislead or deceive consumers, the public and the trade as to the origin, source, sponsorship or affiliation of the Infringing Goods

66. Defendants' wrongful conduct is intended to cause, has caused and is likely to continue to cause such parties to erroneously believe that the Infringing Goods have been authorized, sponsored, approved, endorsed or licensed by Plaintiffs, or that Defendants are in some way affiliated with Plaintiffs.

67. Plaintiffs have been harmed and will continue to be irreparably harmed as a result of Defendants' willful and unlawful actions unless Defendants are permanently enjoined from their unlawful conduct.

68. Without a permanent injunction, Defendants intend to continue their willful infringement of the Polycor Marks.

69. Plaintiffs have no adequate remedy at law.

70. In light of the foregoing, Plaintiffs are entitled to a permanent injunction prohibiting the Antolini Companies from using the Polycor Marks or any marks confusingly similar to the Polycor Marks and from engaging in other conduct that is likely to create a false association between Plaintiffs and Defendants and their products.

COUNT III.

Unfair Competition Under
N.J.S.A. 56:4-1 *et seq.*

71. Plaintiffs repeat and reallege the allegations contained in paragraphs 1 through 70, as if fully set forth herein.

72. Defendants' unauthorized use and misappropriation of the Polycor Marks, which have acquired secondary meaning and are non-functional, was intended to capitalize, for Defendants' own pecuniary gain, on the good will and excellent reputation of Plaintiffs and their products and intellectual property, which Plaintiffs have expended substantial time, resources and effort to obtain.

73. Through their wrongful conduct, Defendants have unfairly competed with and are wrongfully benefiting from intellectual property rights that rightfully belong to Plaintiffs.

74. Defendants' activities are likely to lead to and result in consumer confusion, mistake or deception, and are likely to cause consumers and the public to believe that Plaintiffs have produced, sponsored, authorized, licensed or otherwise approved Defendants' use of the Polycor Marks and/or designs substantially or confusingly similar thereto.

75. Plaintiffs have been harmed and will continue to be irreparably harmed as a result of Defendants' unlawful actions unless Defendants are permanently enjoined from their unlawful conduct.

76. Without a permanent injunction, Defendants their unauthorized use and misappropriation of Plaintiffs' trademarks.

77. Plaintiffs have no adequate remedy at law.

78. In light of the foregoing, Plaintiffs are entitled to an injunction prohibiting Defendants from using the Polycor Marks or any marks confusingly similar to the Polycor Marks, and from engaging in any other conduct likely to falsely and unfairly associate Defendants' products with Plaintiffs and their products.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs Polycor Inc. and Rock of Ages Corporation hereby demand judgment against defendants Antolini Luigi & C. S.p.A. and Antolini do Brasil Ltda. on the foregoing claims as follows:

A. That Defendants, their agents, servants, employees, licensees, sponsors, associates, and attorneys, and all persons acting by, through, or in active concert with any of them, be permanently enjoined from:

i. manufacturing, importing, advertising, marketing, promoting, supplying, distributing, offering for sale or selling worldwide any products using the Polycor Marks, or any other mark substantially or confusingly similar thereto, including, without limitation, the Infringing Goods;

ii. committing any other act which falsely represents or which has the effect of falsely representing that the goods or services of the Defendants are licensed, authorized by, or in any way associated with Plaintiffs;

iii. otherwise infringing Plaintiffs' registered trademarks; and

iv. otherwise unfairly competing with Plaintiffs.

B. That Defendants account to Plaintiffs for all gains, profits and advantages derived from Defendants' wrongful acts;

C. That Plaintiffs recover from the Antolini Companies all of Defendants' profits and all damages, including lost profits, sustained by Plaintiffs as a result of Defendants' wrongful acts, and such other compensatory damages as the Court determines to be fair and appropriate, pursuant to 15 U.S.C. § 1117(a) and the laws of the State of New Jersey;

D. That Plaintiffs recover treble damages from Defendants on Count III, pursuant to N.J.S.A. 56:4-2;

E. That Plaintiffs recover all the costs, disbursements and attorneys' fees incurred by Plaintiffs in bringing its claims, pursuant to 15 U.S.C. § 1117(a);

F. That Plaintiffs recover pre-judgment interest on any monetary award made part of the judgment against Defendants;

G. That Plaintiffs be awarded punitive damages; and

H. Such other and further relief as this Court may deem just and proper.

Dated: April 3, 2017

KELLEY DRYE & WARREN LLP

By /s/ William S. Gyves

William S. Gyves
Vincent Rao II
Ana Y. Correa
(*Pro Hac Vice* Application Pending)
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acorrea@kelleydrye.com
kortega@kelleydrye.com

Attorneys for Plaintiffs
Polycor Inc. and Rock of Ages Corporation

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 11.2

Williams S. Gyves, attorney for Plaintiffs Polycor Inc. and Rock of Ages Corporation, pursuant to 28 U.S.C. § 1746, hereby certifies that the matter in controversy in the above captioned action is not the subject of any other action pending in any court or the subject of a pending arbitration proceedings, nor is any other action or arbitration proceeding contemplated. Plaintiffs are not currently aware of any other party who should be joined in this action.

I certify under penalty of perjury, that the foregoing is true and correct.

Executed: April 3, 2017

/s/ William S. Gyves
William S. Gyves

Exhibit A

Int. Cl.: 19

Prior U.S. Cls.: 1, 12, 33 and 50

Reg. No. 2,619,394

United States Patent and Trademark Office **Registered Sep. 17, 2002**

TRADEMARK
PRINCIPAL REGISTER

AMERICAN BLACK

ROCK OF AGES CORPORATION (DELAWARE CORPORATION)
772 GRANITEVILLE ROAD
GRANITEVILLE, VT 05654

FOR: GRANITE PRODUCTS, NAMELY ROUGH GRANITE BLOCKS, SLABS, MONUMENTS, MEMORIALS, TABLETS, MAUSOLEUMS, AND TOMBSTONES, IN CLASS 19 (U.S. CLS. 1, 12, 33 AND 50).

FIRST USE 6-1-1994; IN COMMERCE 6-1-1994.

SEC. 2(F).

SER. NO. 75-860,872, FILED 12-1-1999.

THEODORE MCBRIDE, EXAMINING ATTORNEY

United States of America

United States Patent and Trademark Office

CAMBRIAN BLACK

Reg. No. 4,722,471

Registered Apr. 21, 2015

Int. Cl.: 19

TRADEMARK

PRINCIPAL REGISTER

POLYCOR INC. (CANADA CORPORATION)
139, ST-PIERRE STREET
QUEBEC CITY, QUEBEC, CANADA G1K8B9

FOR: BUILDING MATERIALS, NAMELY, GRANITE, IN CLASS 19 (U.S. CLS. 1, 12, 33 AND 50).

FIRST USE 0-0-1987; IN COMMERCE 0-0-1987.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "BLACK", APART FROM THE MARK AS SHOWN.

SER. NO. 86-234,293, FILED 3-27-2014.

PAUL E. FAHRENKOPF, EXAMINING ATTORNEY

Director of the United States
Patent and Trademark Office

Exhibit B

https://www.polycor.com/stone/granite/american-black/ | American Black | Polycor

File Edit View Favorites Tools Help

POLYCOR

PROFESSIONALS MEDIA BLOG CONTACT US FR |

STONES APPLICATIONS PORTFOLIO QUARRIES & PLANTS FIND A PRODUCT EXPERT ORDER A SAMPLE

HOME › STONES › GRANITE › AMERICAN BLACK

AMERICAN BLACK

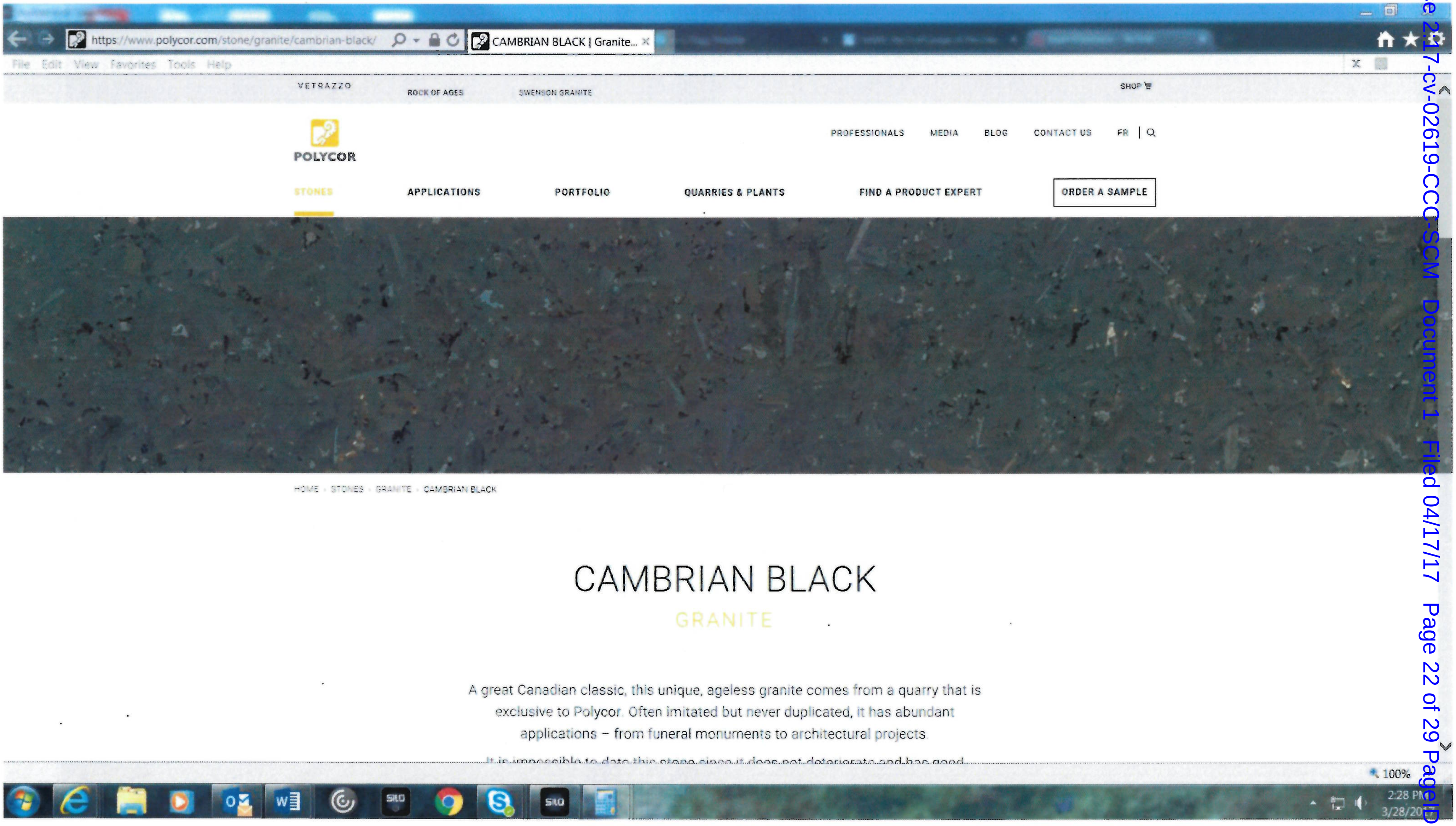
NEW GRANITE

This beautiful black granite with pronounced white veining is being utilized for smaller building projects when quality and durability are a must.

QUARRY LOCATION: ELVERSON, PA, U.S.A

100%

2:30 PM 3/28/20


https://www.polycor.com/stone/granite/cambrian-black/
CAMBRIAN BLACK | Granite...
File Edit View Favorites Tools Help
VETRAZZO
ROCK OF AGES
SWENSON GRANITE
SHOP
POLYCOR
PROFESSIONALS
MEDIA
BLOG
CONTACT US
FR
STONES
APPLICATIONS
PORTFOLIO
QUARRIES & PLANTS
FIND A PRODUCT EXPERT
ORDER A SAMPLE
HOME · STONES · GRANITE · CAMBRIAN BLACK
CAMBRIAN BLACK
GRANITE
A great Canadian classic, this unique, ageless granite comes from a quarry that is exclusive to Polycor. Often imitated but never duplicated, it has abundant applications – from funeral monuments to architectural projects.
100%
2:28 PM
3/28/20

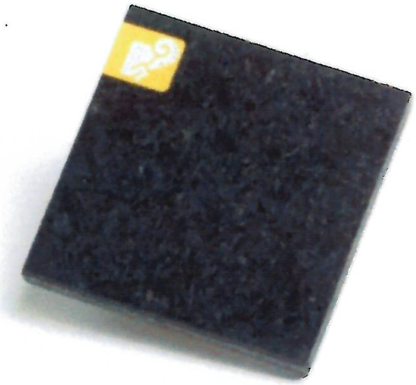
http://shop.polycor.com/eng/products/view/11 — Cambrian Black Sample - G...

File Edit View Favorites Tools Help

SAMPLES MOSAICS & TILES SINKS & TOPS PULLS & KNOBS TABLEWARE JEWELRY

HOME / SHOP BY PRODUCT / POLYCOR / CAMBRIAN BLACK SAMPLE /

< BACK TO LIST < PREVIOUS PRODUCT NEXT PRODUCT >



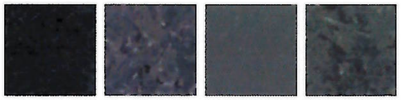
*EXAMPLE OF PRODUCT

CAMBRIAN BLACK SAMPLE - GRANITE

DESCRIPTION:

A luxurious black granite that never loses its depth or intrigue, this classic Canadian granite is well renowned for its distinctive and timeless look. A fine-grained, black shade is enhanced with light grey flashes and a captivating rectilinear mineral structure of the utmost durability and consistency, ideal for creating large slabs for major projects

CHOOSE A FINISH:



Polished Antique Honed Waterjet

10$ QTY - 1 + ADD TO CART

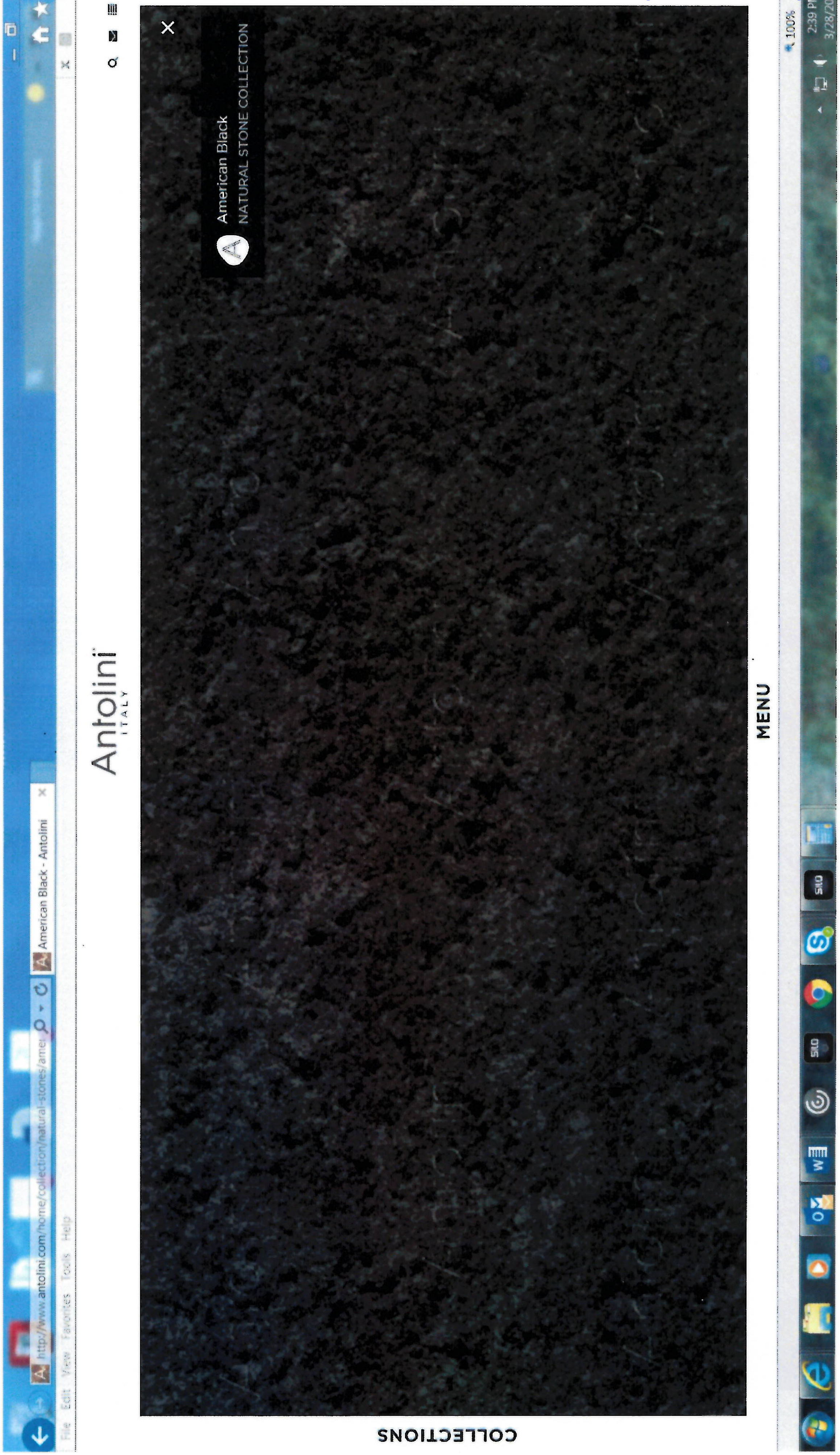
PRODUCT DETAILS | SHIPPING & DELIVERY | RETURN POLICY

SAMPLE DIMENSIONS
4" x 4" x 3/8"

125%

3:55 PM 3/28/20

Exhibit C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American Black - Antolini
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American Black
NATURAL STONE COLLECTION
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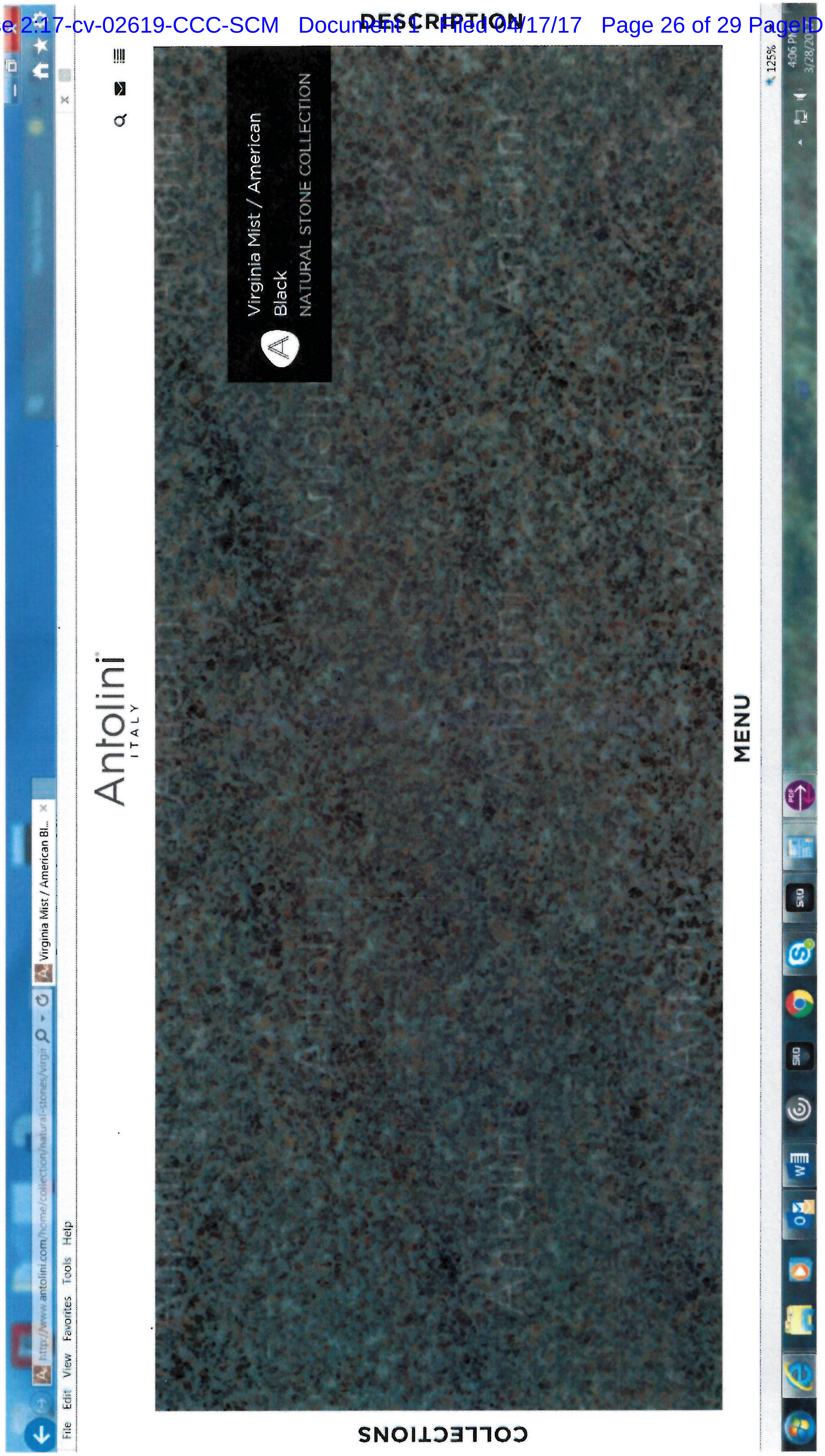
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Virginia Mist / American Bl...
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ITALY
Virginia Mist / American
Black
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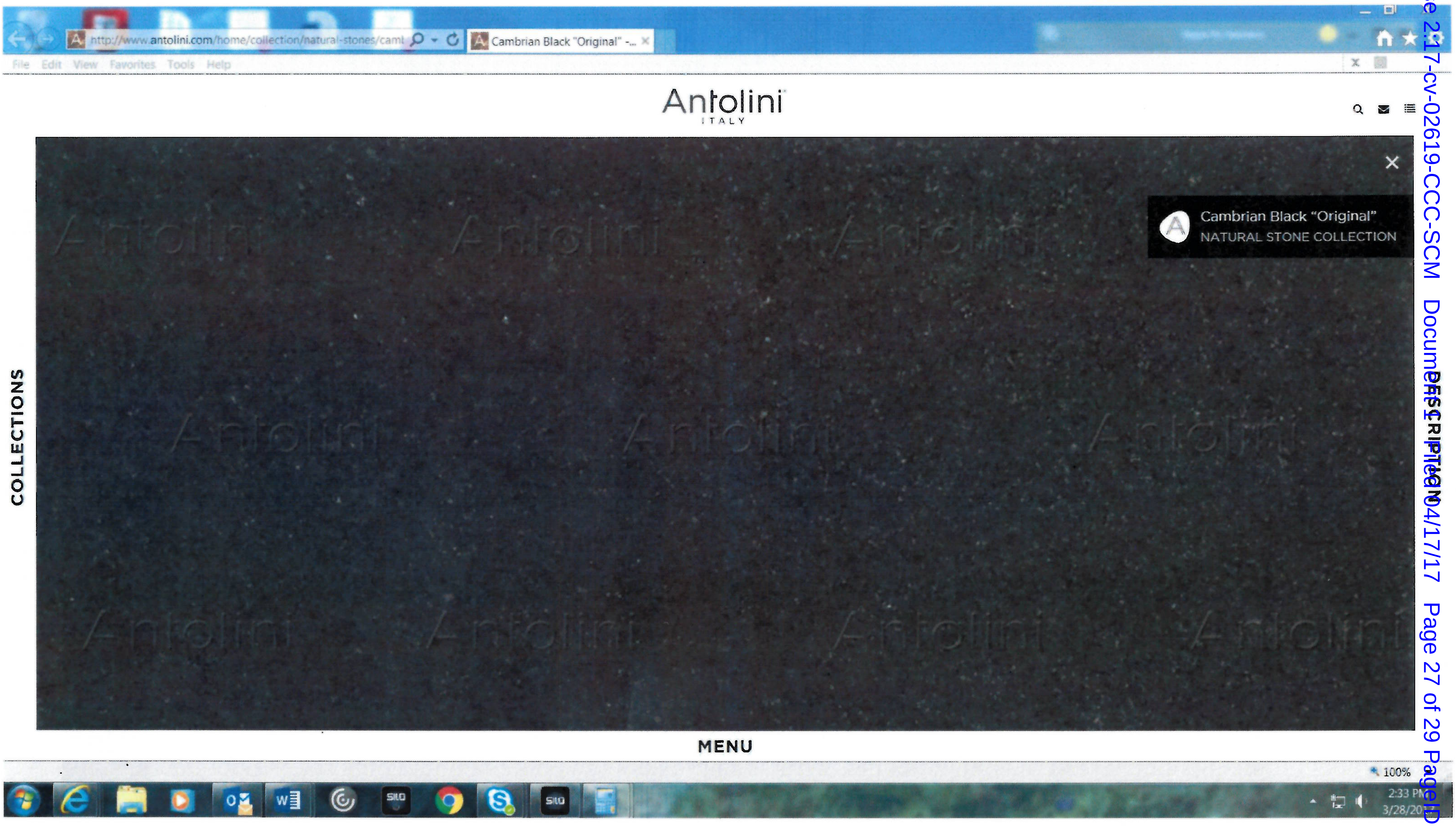
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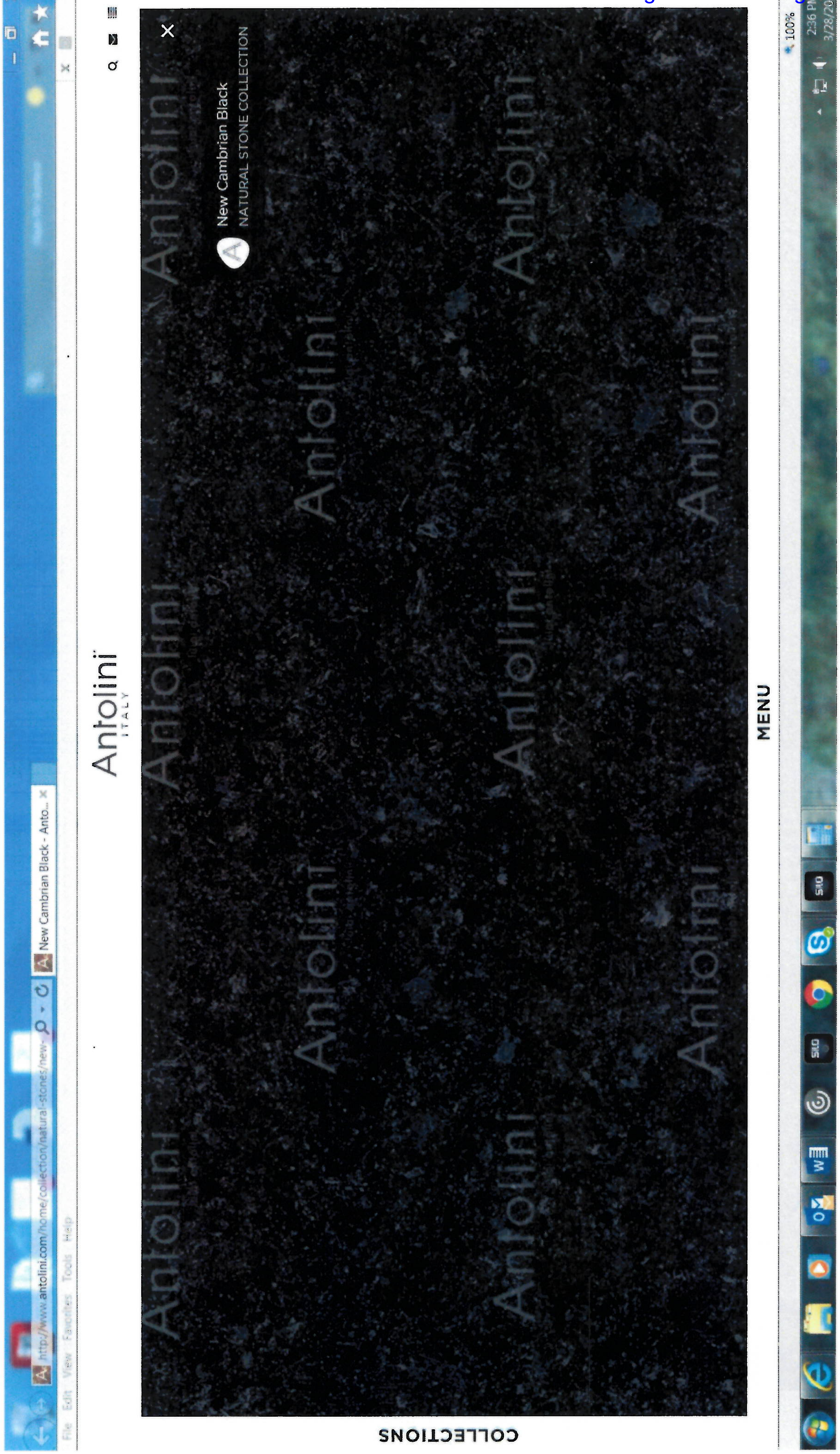
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New Cambrian Black
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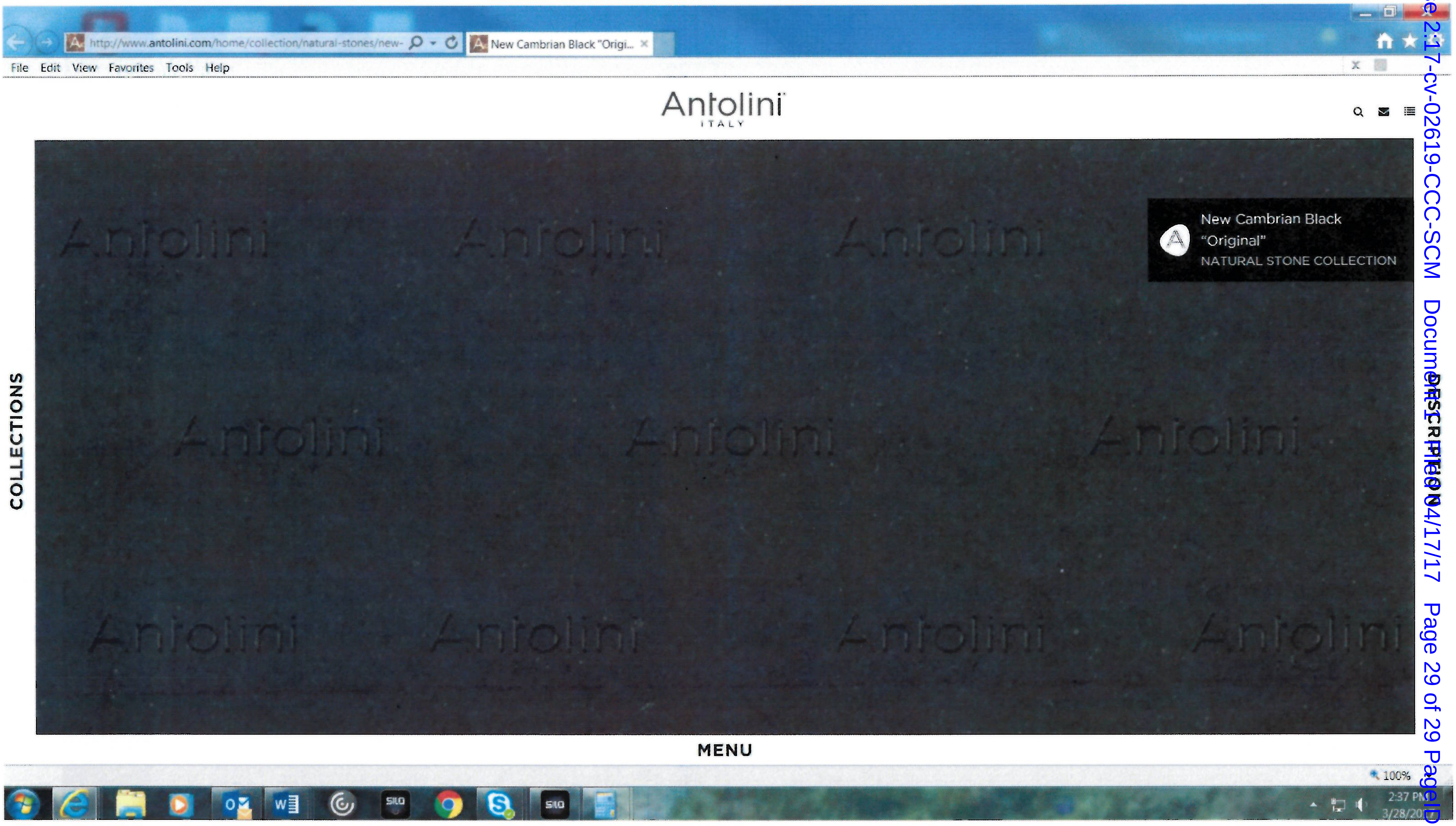
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New Cambrian Black "Origi...
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Antolini
ITALY
New Cambrian Black
"Original"
NATURAL STONE COLLECTION
Antolini
COLLECTIONS
DESCRIPTION
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100%
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